

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

MICAELA GUALDARRAMA et. als.

Plaintiffs,

v.

MARÍA RIVERA, VÍCTOR MARRERO et
als.,

Defendants.

CIVIL NO.: 97-2481 (SEC)

MOTION FOR LEAVE TO WITHDRAW LEGAL REPRESENTATION

TO THE HONORABLE COURT:

COMES NOW, defendants María Rivera and Víctor Marrero, in their personal capacity, represented by the undersigned counsel and respectfully allege and pray:

1. As this Court is aware, and can take judicial knowledge of, the Commonwealth of Puerto Rico is going through a fiscal crisis. The Department of Justice of the Commonwealth of Puerto Rico has been directly affected by this crisis. As a result, all funds have been destined to cover payroll of necessary public employees. Therefore, at this time no funds are available to pay for the professional services of the undersigned attorneys.

2. Based on the above, the Secretary of Justice for the Commonwealth of Puerto Rico (the "Secretary") has requested our withdrawal from the instant case and instructed the undersigned to deliver the case files to the Deputy Secretary for Litigation of the Department of Justice, Vivian González Méndez, Esq. whose physical address, telephone number and e-mail address are:

Vivian González Méndez, Esq.
Deputy Secretary of Litigation
DEPARTMENT OF JUSTICE
5TH Floor
Olimpo Street, Corner of Axtmayer
Santurce, Puerto Rico
Tel. (787) 723-2187

E-mail: vgonzález@justicia.gobierno.pr

3. In view of the above circumstances, we request from this Honorable Court leave to withdraw as counsel for the above mentioned defendants as requested by the Secretary and allow the Department of Justice to reassign the case and in-house to assume legal representation for the appearing defendants.

4. The Department of Justice, through attorney Estades has been inform of the upcoming trial in this case.

5. This request is not intended in any manner to prejudice any of the parties nor to delay the judicial proceedings of this case, but is made solely in light of the above mentioned circumstances.

6. The undersigned counsel further request that all future orders entered by the Court or motion filed by the parties be electronically notified to attorney Vivian González Méndez to her e-mail address through the Court's CM/ECF system.

WHEREFORE, it is respectfully requested from this Honorable Court that this motion be **GRANTED** and, consequently, leave be granted to the undersigned counsel to withdraw as attorneys for the defendants allow the Department of Justice a reasonable time in which to reassign the case to an in-house counsel; and that attorney Vivian González Méndez be electronically notified of this Court's orders and any motion filed by the parties.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12^{ve} day of May, 2006.

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Osvaldo Pérez Marrero, Esq., opm@opmlaw.org, opmlaw@yahoo.com

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